



October 4 2004

Jim Christiansen
EPA Region VIII
999 18th St., Suite 300
Denver, CO 80202

RE: Libby Railyard Biotite Removal, Libby, Montana
EMR Project No. 5539.004
October 01, 2004 Weekly Progress Report

2004 OCT 14 PM 2:08
EPA, REGION VIII
SUPERFUND BRANCH

Dear Mr. Christiansen,

Per the Administrative Order on Consent for Removal, the following is the Weekly Progress Report submitted by EMR, Inc. (EMR) on behalf of the Burlington Northern and Santa Fe Railway Company (BNSF) for the Libby Railyard, Montana, Libby Asbestos Site, Libby Montana. In addition to this report, EMR will also be responsible for the required monthly report on this project through the close of this project.

CURRENT WEEK'S ACTIVITIES

EPA approved RFI #2004-01 which allows clean soil stockpiled during over-excavation to be used as backfill comprising no more than 6 inches of the 12-inch cap over former railroad tracks 3 and 4. The uppermost 6 inches or more of the 12-inch cap will be subballast imported from clean offsite sources (Remp Sand and Gravel).

Envirocon, Inc. (Envirocon) continued the removal of railroad ties; ties that had been washed were loaded into high sided gondola railroad cars and staged off site for disposal. It was decided that all of the visible ties on Tracks 3 and 4 will be washed and disposed of in a landfill if EPA approves. Envirocon demolished and removed the scale pit structures and backfilled the scale excavation with clean fill material.

Envirocon continued with soil excavation on the west end of the site and shipped 3,033 tons in 296 truck-loads to the Lincoln County Landfill between Monday September 27, 2004 and Friday, October 1, 2004. During this week Envirocon was also hauling clean fill and sub-ballast into the site for backfilling and capping.

It was determined during excavation activities on the west end of the site that there are some pockets of material located randomly throughout the area north of the main line in which the presence of hydrated biotite is visible to a depth of three to four feet below the reference elevation, which is the tops of the railroad ties along the main line track.

CDM Personnel visited the site three times during the week. On Tuesday they observed tie washing operations and walked the site to observe overall progress and site activities. On Wednesday the CDM representative indicated that there had been some concern that trucks were not covered. Kennedy/Jenks Consultants (K/J) personnel were able to

demonstrate that those trucks were hauling clean backfill and not the soils from the site. CDM also noted that dust from concrete breaking activities was escaping the exclusion zone; the site crews subsequently altered their watering technique and reduced the visible dust. On Thursday CDM returned to site to discuss some detections of asbestos structures on air samples collected on site the previous Friday. K/J and EMR personnel discussed the impacts and had already taken corrective action which involved moving the exclusion zone boundary farther from the site activities. CDM also expressed that the issue regarding the uncovered trucks was resolved with a telephone call.

Air samples are being collected daily. Personal samples are being analyzed by a combination of Phase Contrast Microscopy (Method 7400, Issue 2) and Transmission Electron Microscopy (TEM) AHERA method. Area samples are being analyzed by TEM AHERA Method. Preliminary laboratory results for TEM samples are being submitted to the USEPA and Volpe via facsimile upon receipt by EMR in Minneapolis, Minnesota. No final copies have been received as of the date of this letter. Final laboratory data will be submitted in hard copy form once received.

Three samples collected on September 24, 2004 contained detectable Libby Amphibole (LA). The laboratory detected one asbestos structure in each of BN-00293 and BN-00296 and three asbestos structures in sample BN-00298 resulting in airborne asbestos concentrations of 0.0044, 0.0042, and 0.0120 structures per cubic centimeter (S/cc), respectively. Upon review of the data and discussions with site personnel, it was determined that the exclusion zone boundary was set up too close to decontamination activities. EMR, K/J, and Envirocon agreed upon a course of action involving moving the exclusion zone boundaries farther from the decontamination activities. As previously mentioned, CMD personnel visited the site and agreed with this course of action.

Two additional personal air samples submitted for analysis had detectable structures. These air samples, BN-00318 and BN-301, were worn by personnel working on the site. The concentration of asbestos or LA fibers did not exceed the clean air standard of 0.01 fibers per cubic centimeter, thus they did not exceed the protection of their respirators.

Clearance soil samples are being collected at the east end of the site; as of the October 1, results for samples BR-12000 through BR-22000 had been received. LA was detected at a concentration of less than one percent (<1%) Tremolite/Actinolite in clearance samples BR-17000 and BR-18000; EMR requested that the discreet samples for these two composites be analyzed. No LA was detected in the other clearance samples submitted. All soil samples are submitted for analysis by Polarized Light Microscopy (PLM) method 9002, Issue 2. Additional discreet samples were submitted but were not analyzed at this time. Preliminary data has been received by EMR and was submitted via facsimile to the USEPA. No final copies of soil analytical data collected last week have been received.

PROBLEMS ENCOUNTERED

No problems have been encountered to date.

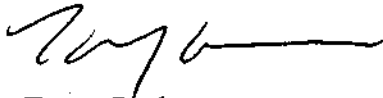
ACTIVITIES PLANNED FOR NEXT TWO WEEKS

Montana Rail Services (MRS) will remobilize to the site to remove remaining rail and other steel track related material at the west end of the site. Envirocon will continue removing railroad ties, washing ties, and loading them for disposal. Soil excavation will continue on site and soils will be transported to Lincoln County Landfill.

Backfilling and grading will continue in areas that have passed soil clearance without detections of LA. Clean fill and the geotextile cloth cap placement will commence.

If you have any questions or require further explanation concerning the above information, please call Tanya Drake of EMR at (763) 277-5200, Chuck Soule of Kennedy/Jenks Consultants at (253) 874-0555, or David Smith of BNSF at (406) 447-2307.

Sincerely,
EMR, Inc.



Tanya Drake
Project Coordinator

cc: Mr. David Smith, BNSF Manager Environmental Remediation, Helena, Montana
Mr. Dave Diem, Kennedy/Jenks Consultants, Libby, Montana
Mr. Chuck Soule, Kennedy/Jenks Consultants, Federal Way, Washington
Ms. Courtney Zamora, Volpe Federal Programs, Libby, Montana
Mr. Dan McCaskill, BNSF Industrial Hygiene, Ft. Worth, Texas